

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

KERIMARIE SUTHERLAND,

§ § § § § § § § § §

Plaintiff/Claimant

§§ 3

vs.

Civil Action No. 3:23-cv-02665-B

OTB ACQUISITION, LLC

§§§§

Defendant/Respondent.

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JOINT STATUS REPORT

Pursuant to the Court’s Status Report Order [ECF 9], Plaintiff/Claimant Kerimarie Sutherland (“Plaintiff/Claimant”) and Defendant/Respondent OTB Acquisition, LLC (“Defendant/Respondent”) (jointly, the “Parties”) submit this Joint Status Report.

On April 4, 2024, the American Arbitration Association (“AAA”) appointed William Morris Lamoreaux as the arbitrator for this matter. The Parties’ counsel conferred via a Zoom meeting on April 23, 2024. Jonathan J. “Jack” Walters was present on behalf of Claimant. Michaela D. Noble was present on behalf of Respondent. The Parties attended the arbitration management conference via telephone on April 25, 2024 with Arbitrator Lamoreaux. Jonathan J. “Jack” Walters was present on behalf of Claimant. Celeste R. Yeager and Michaela D. Noble were present on behalf of Respondent.

During the arbitration management conference, the Parties confirmed that they propose the following case deadlines:

1. Hearing on the Merits:

The Parties proposed that the arbitration be held on May 6-8, 2025.

2. Pre-Hearing Mediation Attempt:

The Parties propose that mediation be completed by December 6, 2024.

3. Specification of Claims and Counterclaims:

The Parties propose that the deadline to specify claims be May 25, 2024. The Parties propose that the deadline to respond to the specification of claims be June 24, 2024.

The Parties propose that the deadline to specify counterclaims be June 24, 2024. The Parties propose that the deadline to respond to the specification of counterclaims be July 8, 2024.

4. Date for Identification and Exchange of Witnesses:

The Parties propose that the deadline for Claimant to identify and exchange witnesses be March 2, 2025. The Parties propose that the deadline for Respondent to identify and exchange witnesses be April 2, 2025.

5. Exchange of Documents/Discovery:

The Parties propose that the deadline for propounding written discovery requests be December 7, 2024. The Parties propose that the deadline for written discovery responses be January 6, 2025.

The Parties propose that depositions be complete by February 6, 2025. The Parties propose that discovery be completed by March 3, 2025.

6. Stipulations of Uncontested Facts (if any):

The Parties propose that the deadline for stipulations of uncontested facts be April 22, 2025.

7. Dispositive Motion Deadline:

The Parties propose that the deadline for dispositive motions be March 7, 2025.

8. Advanced Exchange of Identification of Exhibits:

The Parties propose that the deadline for the advanced exchange of identification of exhibits be April 22, 2025.

The Parties are awaiting a Final Scheduling Order for the arbitration.

Dated: April 25, 2024

Respectfully submitted,

Jonathan J. "Jack" Walters

/s/ Jonathan J. Walters

*signed with permission
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